

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS**

BODUM USA INC., and PI-DESIGN AG,

Plaintiffs,

v.

STARBUCKS CORPORATION,

Defendant.

No. 1:23-cv-02946

Judge: Hon. Andrea R. Wood

**JOINT STATUS REPORT**

Pursuant to the Court’s Minute Entry dated March 22, 2024 (Dkt. No. 49), Plaintiffs Bodum USA Inc. and Pi-Design AG (collectively, “Bodum”), and Defendant Starbucks Corporation (“Starbucks”), submit this Joint Status Report.

**A. Status of Fact Discovery**

On October 2, 2023, Starbucks served its responses to Bodum’s requests for production of documents and interrogatories. Shortly thereafter, on October 16, 2023, Bodum served its responses to Starbucks first set of document requests, interrogatories, and requests for admissions. Following the entry of the parties’ agreed confidentiality order on November 28, 2023, both parties made an initial production of documents. On December 4, 2023, Bodum produced an initial set of 576 documents. Starbucks also made an initial production on December 14, 2023, containing approximately 179 documents.

In an effort to cooperatively address discovery disputes, counsel for the parties exchanged discovery deficiency correspondence, engaged in two meet and confers, and are productively addressing alleged deficiencies on both sides. Since the parties’ meet and confers in November 2023, Bodum’s original outside counsel withdrew, and the current counsel of record filed their

notices of appearance in February 2024. After engaging in unsuccessful settlement discussions in March and April (addressed in the next section), the parties began preparing document productions and taking additional steps to address the discovery deficiencies identified during the final months of 2023.

Starbucks anticipates serving a second document production on Friday, May 24, 2024. On May 21, 2024, Bodum provided its provisional approval of Starbucks proposed list of custodians and search terms for Bodum's Requests for Production ("RFP") 5 – 8. Bodum's RFPs 5 – 8 seek documents related to the parties' 2008 Settlement Agreement and both non-Bodum and Bodum French press coffee makers that Starbucks sold or considered selling from 2008 to the present. The parties have been working together to develop an appropriate set of search terms that capture relevant documents and result in a reasonable document collection and review that is proportional to the needs of the case. Relying upon this list of custodians and search terms, Starbucks anticipates making rolling productions throughout the months of May and June. On May 21, 2024, Bodum also proposed an additional search term for Bodum's RFPs 5 and 6 that will be the subject of a meet and confer between the parties before the end of May. The parties hope that their disagreement regarding Bodum's additional search term request can be resolved without the intervention of the Court.

Bodum is preparing supplemental discovery responses with regard to the alleged discovery deficiencies that Starbucks identified in a February 22, 2024 email to Bodum's new counsel of record. Bodum anticipates serving those supplemental responses by June 1, 2024. Bodum also will provide a supplemental document production on or before June 1, 2024. Bodum anticipates that this production will consist of all additional responsive documents that have been identified,

except for those that remain in dispute. The parties will meet and confer on any additional categories of documents sought by Starbucks.

The parties anticipate taking depositions in July, August, and the first two weeks of September. At this time, the parties anticipate completing fact discovery by September 16, 2024.

**B. Settlement Prospects**

The parties have discussed the prospect of settlement, but do not believe a settlement will be reached at this time. The parties continue to work cooperatively and productively to resolve disputes arising in the context of this litigation. The parties do not request a referral to the magistrate judge for a settlement conference.

**C. Telephonic Status Hearing**

The parties do not require a telephonic status hearing.

DATED: May 22, 2024

Respectfully Submitted,

BODUM USA, INC.  
PI-DESIGN AG

STARBUCKS CORPORATION

By: /s/ James Griffith  
One of Their Attorneys

By: /s/ Brian J. Smith  
One of Its Attorneys

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CERTIFICATE OF SERVICE

I hereby certify that on May 22, 2024, I caused a true and correct copy of the forgoing Joint Status Report to be served upon all counsel of record via the Court's ECF system.

By: /s/ Brian J. Smith  
Brian J. Smith